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August 18, 2021

VIA ELECTRONIC FILING

Hon. Brian R. Martinotti, U.S.D.J.
United States District Court, District of New Jersey
Martin Luther King Building & U.S. Courthouse
Court Room: MLK 2D
50 Walnut Street
Newark, NJ 07012
(F): (973) 645-6651

Re: Williams, et al. v. BASF Catalysts LLC, et al., No. 11-1754 (D.N.J.)

Dear Judge Martinotti:

Pursuant to the Preliminary Approval Order (ECF No. 623) and May 21, 2021 Case Management Order (ECF No. 635), Plaintiffs will be filing the Motion for Final Approval of the Class Action Settlement on August 19, 2021. Pursuant to Local Rule of Civil Procedure 7.2.(b), we now write to respectfully request permission to file a 96-page brief in support of Final Approval, an issue of significant importance to this case. Plaintiffs respectfully believes that a 96-page limit on the brief will assist the Court in considering the many factors that the Court must consider for the final approval of the Class Action Settlement pursuant to Federal Rule of Civil Procedure 23(e).

We appreciate your consideration of this request.

Respectfully,

/s/ Christopher M. Placitella

CHRISTOPHER M. PLACITELLA

Counsel for Plaintiffs and the Settlement Class

Hon. Brian R. Martinotti, U.S.D.J.

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cc:

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Anthony Vale, Esq. (*counsel for Cahill Gordon & Reindel*) (via e-mail only)

SO ORDERED:

BRIAN R. MARTINOTTI, U.S.D.J.

Dated: